

November 5, 2024

**VIA ECF FILING**

Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States of America v. Visa Inc.*; Case No. 1:24-cv-07214 (JGK)**

Dear Judge Koeltl:

The parties in the above-captioned matter jointly write to the Court regarding Visa Inc.'s anticipated request to file a motion to dismiss. Visa's current deadline to respond to the Complaint is November 25, 2024. Visa will file a letter motion by November 20, 2024, respectfully requesting that the Court, pursuant to Your Honor's Individual Practices Rule II.B, set a pre-motion conference to permit Visa to file a motion to dismiss the Complaint. If Your Honor grants Visa's letter motion, the parties will make themselves available for a pre-motion conference whenever is most convenient for the Court.

The parties have met and conferred to discuss a briefing schedule, in the event the Court grants Visa's request to file a motion to dismiss. We respectfully jointly request the entry of the following schedule for briefing Visa's motion to dismiss if the Court grants Visa's request to file:

- Visa's deadline to file a motion to dismiss, or otherwise respond to the Complaint, is extended to December 16, 2024.
- The Government's response to a motion to dismiss is to be filed by January 21, 2025.
- Visa's reply is to be filed by February 7, 2025.

No previous requests for an adjournment or extension of time have been made.

Respectfully submitted,

/s/ Edward Duffy

/s/ Beth A. Wilkinson

Edward Duffy  
Bennett J. Matelson  
Michele Trichler

United States Department of Justice  
Antitrust Division  
450 Fifth Street, NW, Suite 4000  
Telephone: (202) 812-4723  
Facsimile: (202) 514-7308  
Edward.Duffy@usdoj.gov  
Bennett.Matelson@usdoj.gov  
Michele.Trichler@usdoj.gov

*Counsel for the United States*

Beth A. Wilkinson  
Brian Stekloff (admitted *pro hac vice*)  
Kieran Gostin  
WILKINSON STEKLOFF LLP  
2001 M Street NW, 10th Floor  
Washington, DC 20036  
Telephone: (202) 847-4000  
Facsimile: (202) 847-4005  
bstekloff@wilkinsonstekloff.com  
bwilkinson@wilkinsonstekloff.com  
kgostin@wilkinsonstekloff.com

Anne P. Davis (admitted *pro hac vice*)  
Jonathan Ian Gleklen (admitted *pro hac vice*)  
ARNOLD & PORTER KAYE SCHOLER LLP  
601 Massachusetts Avenue NW  
Washington, D.C. 20001  
Telephone: (202) 942-6197  
Facsimile: (202) 942-5999  
anne.davis@arnoldporter.com  
jonathan.gleklen@arnoldporter.com

*Counsel for Defendant Visa Inc.*

CC: All Counsel of Record (via ECF)